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December 1, 2004

Marlene Dortch Secretary Federal Communications Commission 445 12 St., S.W. Washington, D.C. 20554

Re: MCI Supplemental 2004 Report on the Status of Waived IP-

Relay and Video Relay Services, CC Docket No. 98-67, CG

Docket No. 03-123

Dear Ms. Dortch:

Please find attached MCI's 2004 Supplemental Report on the Status of Several Waived IP-Relay Features and waived Video Relay Service features in general, as requested by Thomas Chandler, Chief, Disability Rights Office, Consumer and Governmental Affairs Bureau.

If you have any questions please contact me at the above-listed number

Sincerely,

/s/ Larry Fenster

Larry Fenster

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	CG Docket No. 03-123
Disabilities	ĺ	

SUPPLEMENTAL REPORT ON WAIVED IP-RELAY AND VIDEO RELAY SERVICES MCI

I. Introduction

In an October 22, 2004 letter, Thomas Chandler, Chief, Disability Rights Office, Consumer and Governmental Affairs Bureau, requested MCI to file a supplemental discussion of the progress made towards offering features the Commission waived for video relay service ("VRS") in general, and three features of Internet Protocol ("IP") IP-Relay: 1) call release, 2) three way calling, and 3)

speed dialing requirements. The letter mentioned that MCI's April 16, 2004 Annual Report had failed to include a discussion of these waived features.¹

II. Discussion of Waivers From VRS Features

MCI did not file a progress report with regard to any waived VRS features, since it had relied solely on its vendor, Hands On Video Relay ("HOVRS") to provide this service. HOVRS filed its annual report on progress made meeting waived VRS features on April 16, 2004. MCI had relied upon the representations HOVRS made in this report, and has filed HOVRS' report along with this supplemental report.²

III. Discussion of Waivers From Specific IP-Relay Features

MCI has made significant progress with regard to two of the three waived IP-Relay features mentioned above, and is prepared to make them available in the near future, or is already doing so.

A. Call Release

Call release involves the ability of a relay center to connect a calling and called party and then remove the center from playing any intermediating role and allow the parties to directly communicate using their customer premise equipment ("CPE"). MCI is not aware of any technology or innovations that make it

¹ Letter from Thomas Chandler to Larry Fenster requesting supplemental information regarding annual waiver report ("Supplemental Request"), dated October 22, 2004.

² Annual Report On Progress Of Meeting Waived Requirements, Hands On Video Relay Service, CG Docket No. 03-123, April 16, 2004.

possible for CPE utilizing incompatible protocols to directly communicate were the relay center to remove itself from playing an intermediating role.

B. Three-way calling

Three-way calling involves the ability of a person to make a conference call involving three people. This may currently be done by asking a relay operator to make the conferencing connection, or the calling party may establish one leg of the connection and then use "flashook" to conference in a third party. MCI has been developing this capability during the last year, and intends to make it available to its IP-Relay customers within the next 3-6 months.

C. Speed Dialing

Speed dialing involves manually storing a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile, and then allowing a calling party to request the relay operator to dial this code in order to speed dial. MCI Global Relay currently offers the IP-Relay equivalent of speed dialing. An IP-Relay customer establishes a profile of speed dial numbers that he or she may access from MCI's Global Relay web site. At that point, the calling party selects the speed dial number of choice and the call is automatically dialed through to the called party.

If you have any questions, please feel free to contact me at the number listed below.

Respectfully Submitted

/s/ Larry Fenster Larry Fenster 1133 19th St., NW Washington, DC 20036 202-736-6513

cc: Thomas Chandler

Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2004

/s/<u>Larry Fenster</u> Larry Fenster 1133 19th St., NW Washington, DC 20036 202-736-6513